

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re Jarred E. Fox  
Debtor(s)

Case No. 23-10328  
Chapter 13

**ANSWER OF DEBTOR TO MOTION OF MIDFIRST BANK FOR RELIEF FROM STAY**

The debtor, Jarred E. Fox, through his attorney, answers the above Motion as follows:

1. The debtor has made all mortgage payments to MidFirst bank except for the current payment due and owing.
2. Debtor, through counsel, has reached out to MidFirst's counsel to address the one payment now due.
3. Debtor believes the instant Motion is premature.

WHEREFORE, the debtor respectfully requests that this Court enter an order denying the MidFirst Motion, and that he be granted such other and further relief as is just and proper.

Dated: September 4, 2025

Respectfully submitted,

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By: /s/ Alaine V. Grbach  
Alaine V. Grbach 45485  
Attorney for Debtor(s)